

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

DEBRA HATTEN-GONZALES, et al.,

Plaintiffs,

vs.

No. CIV 88-0385 KG/CG
Consolidated with
No. CIV-88-0786 KG/CG

DAVID R. SCRASE, Secretary of the
New Mexico Human Services Department,

Defendant.

Notice – Attorney’s Fee Invoices Received and Paid by HSD

COMES NOW David R. Scrase, M.D., Secretary of the New Mexico Human Services Department (Defendant or HSD) and provides notice to the Court of the invoices submitted by counsel for the Plaintiffs and paid by HSD in this matter for a period covering the later parts of 2019 through July 2022.

Respectfully submitted,

/s/ Paul R. Ritzma

Paul R. Ritzma

General Counsel

New Mexico Human Services Department

1474 Rodeo Road

P.O. Box 2348

Santa Fe, New Mexico 87505

505-476-7048

paul.ritzma@state.nm.us

Attorney for the Defendant

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing pleading electronically with the United States District Court, causing the same to be electronically serviced on opposing counsel.

/s/ Paul R. Ritzma
Paul R. Ritzma

**DANIEL YOHALEM
ATTORNEY AT LAW**

1121 PASEO DE PERALTA
SANTA FE, NEW MEXICO 87501
505-983-9433 Fax 505-989-4844
During Covid: 505-690-2193
daniel.yohalem@gmail.com

Invoice submitted to:

N.M. Human Services Department
Santa Fe, NM

July 5, 2022

In Reference To: *Hatten-Gonzales v. Scrace*:
Application and Recertification Process for Medicaid and SNAP

Invoice #10145

<u>Date</u>	<u>Professional Services</u>	<u>Hours</u>
4/13/22	Call with Special Master (0.3), review/revise case review letter	1.0 hours
4/19/22	Call with Special Master	0.6 hours
4/20/22	Attend zoom Meet and Confer re CAPs and case backlogs	1.3 hours
5/2/22	Review and revise non-compliance letter to Special Master	2.5 hours
5/9/22	Meeting with Special Master about non-compliance letter (1.0), follow-up conference with co-counsel re. next steps	1.3 hours
5/20/22	Prep for and Meet and Confer in ABQ, travel (2.0)	5.0 hours
6/8/22	Meet with Special Master, Defendant re case review process	0.8 hours
6/8/22	Meet with Special Master, co-counsel re next steps	1.2 hours
6/13/22	Meet with Special Master about need for plan of action to address backlog and case review timing, follow up meeting with co-counsel	1.5 hours
6/24/22	Meet with Special Master re. Case file review and backlog	1.5 hours
6/30/22	Review files, meet with co-counsel about prospective motions	1.0 hours
Total professional services rendered		17.7 hours
Total Attorneys Fees @ \$350/hour		\$6,195.00
NM GRT @ 8.4375%		\$ 522.70
<u>Total amount of this bill</u>		<u>\$6,717.70</u>

DANIEL YOHALEM

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Invoice submitted to:
 N.M. Human Services Department
 Santa Fe, NM

January 6, 2022

In Reference To: Hatten-Gonzales v. Scrace:
 Application and Recertification Process for Medicaid and SNAP

Invoice #10130

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
10/4/2021	Review and revise Language Access motion	1.5 350/hr.	525.00
10/15/2021	Review documents and attend Meet and Confer	1.5 350/hr.	525.00
10/18/2021	Telecon co-counsel	0.5 350/hr.	175.00
10/22/2021	Review Court's order and telecon co-counsel	0.8 350/hr.	280.00
11/1/2021	Review Def Stip CAP and attachment	1.5 350/hr.	525.00
11/2/2021	Telecon with co-counsel next steps as to CAP and review and revise letter to SM re same	1.25 350/hr.	437.50
11/3/2021-11/4/2021	Emails and call with Special Master re CAP	1.0 350/hr.	350.00
11/4/2021	Review documents and telecon with co-counsel	1.0 350/hr.	350.00
11/11/2021	Review and revise letter to Special Master re. CAP	1.0 350/hr.	350.00
11/16/21	Mandatory CAP meeting with Special Master	1.3 350/hr.	455.00

11/16/2021	Telecon co-counsel re. CAP next steps	1.0	350/hr.	350.00
11/17/2021-11/30/2021	Telecons with Special Master	1.5	350/hr.	525.00
11/18/2021	Telecon with co-counsel	0.4	350/hr.	140.00
11/19/2021-11/22/2021	Review and revise letters to Special Master re. CAP	2.0	350/hr.	700.00
11/30/2021	Telecon co-counsel re. meet and confer	0.5	350/hr.	175.00
12/1/2021	Telecon Special Master	1.4	350/hr.	490.00
12/4/2021	Review and revise Reply Brief for Language Access Motion	2.0	350/hr.	700.00
12/14/2021	Prep for and telecon with co-counsel re evidentiary hearing on Language Access motion	1.5	350/hr.	525.00
	For professional services rendered	21.65		\$7,577.50
	NM GRT 8.4375			639.35
	Total amount of this bill			\$8,216.85

00385/53

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During Covid: 505-690-2193

Invoice submitted to:
N.M. Human Services Department
Santa Fe, NM

July 6, 2021

In Reference To: Hatten-Gonzales v. Scrace: Application and Recertification Process
for Medicaid and SNAP

Invoice #10050

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
4/8/2021 Meeting with Special Master re. CAP compliance	1.00 350.00/hr	350.00
4/22/2021 Meeting with Special Master re. Defendant's case review process errors	1.00 350.00/hr	350.00
4/23/2021 Prep for (1.0) and attend Meet and Confer (1.0)	2.00 350.00/hr	700.00
4/28/2021 Review Defendant's case review letter and formulate Plaintiff's position and response	1.00 350.00/hr	350.00
5/6/2021 Telecon with co-counsel re. next steps	1.00 350.00/hr	350.00
6/12/2021 Review Special Master's case file review report	2.00 350.00/hr	700.00
6/14/2021 Telecon with co-counsel re. Special Master's Case File Review Report	1.00 350.00/hr	350.00
6/15/2021 Meeting with Special Master and Defendant, and follow-up meeting with Special Master re. Plaintiffs' access to HSD case files	1.00 350.00/hr	350.00
Meeting with co-counsel re. response to Special Master's Case File Review Report	1.30 350.00/hr	455.00
6/24/2021 - 6/25/2021 Review and revise Plaintiffs' response to Special Master's Case File Review Report	5.00 350.00/hr	1,750.00

N.M. Human Services Department

Page 2

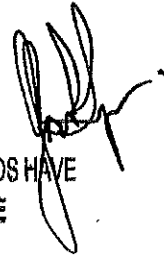
	<u>Hrs/Rate</u>	<u>Amount</u>
6/29/2021 Review Defendant's response to Special Master's case file review report and meet with co-counsel re. Plaintiffs' response to Defendant	2.00 350.00/hr	700.00
For professional services rendered	18.30	\$6,405.00
NM GRT 8.4375		\$540.42
Total amount of this bill		\$6,945.42 /

DANIEL YOHALEM
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1121 PASEO DE PERALTA
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Invoice submitted to:
N.M. Human Services Department
Santa Fe, NM

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AVAILABLE. ACCOUNTING RECORDS HAVE
BEEN CHECKED & AMOUNT IS DUE



July 6, 2020

In Reference To: Hatten-Gonzales v. Scrace: Application and Recertification
Process for Medicaid and SNAP

Invoice # 10006A

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
4/1/2020 Draft response to Defendant's motion re. sealed orders	4.50 350.00/hr	1,575.00
4/7/2020 Draft Plaintiffs' motion to reconsider order on hearing exhibits	1.50 350.00/hr	525.00
4/8/2020 Review waiver request document from HSD and questions for HSD experts	1.00 350.00/hr	350.00
4/14/2020 Review HSD Covid-19 actions (0.5) and telecon with co-counsel re. HSD compliance and next meet and confer (1.5)	2.00 350.00/hr	700.00
4/15/2020 Telecons co-counsel re compliance issues and upcoming meet and confer	1.00 350.00/hr	350.00
4/16/2020 Telecons co-counsel re compliance issues and upcoming meet and confer	1.00 350.00/hr	350.00
4/17/2020 Meet and confer	1.00 350.00/hr	350.00
Telecon co-counsel re next steps following meet and confer	1.50 350.00/hr	525.00
4/22/2020 Review Defendant's stay proposal, telecon with co-counsel re. same	1.00 350.00/hr	350.00
5/13/2020 - 5/14/2020 Telecons with co-counsel re next meet and confer	1.00 350.00/hr	350.00

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AUG 04 2020

HSD
SECRETARY'S OFFICE

N.M. Human Services Department

Page 2

	<u>Hrs/Rate</u>	<u>Amount</u>
5/15/2020 Meet and confer (2 hours); meeting with co-counsel re follow-up (0.5 hours)	2.50 350.00/hr	875.00
5/27/2020 Meeting with Special Master (1 hour); meeting with co-counsel re same (0.6 hour)	1.60 350.00/hr	560.00
6/5/2020 Review and revise letter to Special Master re. outstanding issues in the case; telecon co-counsel re. same	2.00 350.00/hr	700.00
6/17/2020 Review and revise letter to Special Master re. case review process; zoom meeting with Defendant and Special Master re. status of outstanding cap issues and Doc. 937	3.50 350.00/hr	1,225.00
6/19/2020 Telecon co-counsel re next steps and pending matters	0.40 350.00/hr	140.00
6/30/2020 Draft notice of resolved issues	1.00 350.00/hr	350.00
For professional services rendered	26.50	\$9,275.00
NM GRT 8.4375		\$782.58
Total amount of this bill		\$10,057.58

00191572

16-11-20

DANIEL YOHALEM
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dyohalem@aol.com

Invoice submitted to:
N.M. Human Services Department
Santa Fe, NM

April 8, 2020 /

In Reference To: Hatten-Gonzales v. Earnest; Application and Recertification
Process for Medicaid and SNAP

Invoice #10016 /

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
1/17/2020 Prepare for and Meet and Confer with Defendant in SF	2.00 350.00/hr	700.00
1/30/2020 Meeting with Special Master in ABQ (1.3 hours), drive to and from (2.0 hours)	3.30 350.00/hr	1,155.00
2/21/2020 Meeting with co-counsel re. HSD compliance actions for Decree and CAP (1.0), Meet and Confer with Defendant (1.5), drive to and from ABQ (2.0)	4.50 350.00/hr	1,575.00
3/2/2020 Telephone conference with co-counsel re. Special Master questions at last meet and confer	1.00 350.00/hr	350.00
3/10/2020 Meet with Special Master in Santa Fe	1.00 350.00/hr	350.00
Telephone conference with co-counsel re. letters to Defendant concerning experts and data	1.00 350.00/hr	350.00
Review and revise letter re. outstanding issues in case	1.10 350.00/hr	385.00
3/12/2020 Court appearance for telephonic Hearing re. Defendant request to file sealed motion	1.00 350.00/hr	350.00
Review and revise drafts of letters re experts and data and telephone conference with co-counsel re. same	1.00 350.00/hr	350.00
3/17/2020 Review documents and telephone conference with co-counsel in preparation for April 1 hearing on motions	3.00 350.00/hr	1,050.00

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1121 PASEO DE PERALTA
SANTA FE, NEW MEXICO 87501
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dyohalem@aol.com

8611-20

Invoice submitted to:
N.M. Human Services Department
Santa Fe, NM

January 2, 2020 /

In Reference To: Hatten-Gonzales v. Earnest; Application and Recertification
Process for Medicaid and SNAP

Invoice #10009. /

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
10/1/2019 Meeting with Special Master and HSD about immigration delays, issues and fixes attended by telephone.	2.00 350.00/hr	700.00
11/15/2019 Meet and Confer at HSD (SF) with Special Master and HSD.	0.90 350.00/hr	315.00
* 11/18/2019 Review and revise Plaintiffs' Motion to Enforce Compliance	4.70 350.00/hr	1,645.00
11/21/2019 Court Appearance for status conference in Las Cruces (3 hrs), meet with co-counsel afterward (1 hr); drive to and from Las Cruces (8 hrs)	12.00 350.00/hr	4,200.00
12/2/2019 Telephone conference with co-counsel re. HSD request to withdraw compliance motion, review and revise letter re. same	1.00 350.00/hr	350.00
12/9/2019 Attend HSD interviews with Special Master Parker and Ramona McKissic at HSD in Santa Fe	4.20 350.00/hr	1,470.00
12/10/2019 Multiple telecons with co-counsel; call with special master r	2.00 350.00/hr	700.00
12/12/2019 Legal research; Prepare for and participate in Court telephonic hearing.	1.80 350.00/hr	630.00
12/16/2019 Review and revise Plaintiffs' Response to defendants' motion to modify decree and dismiss timeliness requirements	2.30 350.00/hr	805.00
For professional services rendered	30.90	\$10,815.00

N.M. Human Services Department

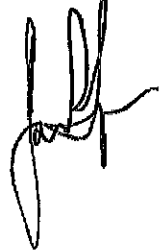
Page 2

Additional Charges :

	<u>Amount</u>
11/20/2019 Mileage for drive to and from Las Cruces November 20, 2019 (582 miles x \$0.58)	337.56
Total costs	<u>\$337.56</u>
NM GRT 8.4375	\$912.52
Total amount of this bill	<u>\$12,065.08</u>

Total amount of this bill:	\$12,065.08
	<u>- \$1,645.00*</u>
	\$10,420.08 <i>sls</i>

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BEEN CHECKED & AMOUNT IS DUE



00185091

Receipt ID 0000159591

DANIEL YOHALEM
ATTORNEY AT LAW

1121 PASEO DE PERALTA
SANTA FE, NEW MEXICO 87501
505-983-9433 FAX 505-989-4844
dyohalem@aol.com

11-5-19

Invoice submitted to:
N.M. Human Services Department
Santa Fe, NM

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BEEN CHECKED & AMOUNT IS DUE

October 3, 2019

In Reference To: Hatten-Gonzales v. Earnest: Application and Recertification
Process for Medicaid and SNAP

Invoice #10006.

Professional Services

	Hrs/Rate	Amount
7/2/2019 Attend CAP negotiation in ABQ with HSD and Special Master, drive to and from ABQ	4.20 350.00/hr	1,470.00
7/3/2019 Draft Joint Motion to Approve 2 CAPs	2.10 350.00/hr	735.00
Draft email to HSD re. Court Orders not superseded by Revised Consent Decree	1.00 350.00/hr	350.00
7/19/2019 Attend Meet and Confer in Santa Fe	1.80 350.00/hr	630.00
7/31/2019 Meet with Special Master in ABQ, drive to and from meeting	4.00 350.00/hr	1,400.00
8/16/2019 Attend Meet and Confer in ABQ, drive to and from meeting	3.80 350.00/hr	1,330.00
8/19/2019 Meeting in Santa Fe with HSD and Special Master re. status of compliance with outstanding orders	1.50 350.00/hr	525.00
8/27/2019 Meeting with Special Master in ABQ, drive to and from	3.50 350.00/hr	1,225.00
9/9/2019 Meeting with Paul Ritzma and Ed Chavez in Santa Fe	1.00 350.00/hr	350.00
9/19/2019 Telephone conference with Special Master	1.00 350.00/hr	350.00
For professional services rendered	23.90	\$8,365.00
NM GRT 8.4375		\$705.80
Total amount of this bill		\$9,070.80

RECEIVED
OCT 13 2019

001812911

Receipt ID 0000156078

DANIEL YOHALEM

ATTORNEY AT LAW

1121 PASEO DE PERALTA
 SANTA FE, NEW MEXICO 87501
 505-983-9433 FAX 505-989-4844
 dyohalem@aol.com

7-19-19

Invoice submitted to:
 N.M. Human Services Department
 Santa Fe, NM

July 1, 2019

In Reference To: Hatten-Gonzales v. Earnest: Application and Recertification
 Process for Medicaid and SNAP

Invoice #10007,

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
6/21/2019 Meet and confer with HSD and Special Master about Corrective Action Plan, telephone conference with co-counsel to prepare for meet and confer, drive to and from ABQ	4.00 350.00/hr	1,400.00
6/24/2019 Meeting with HSD and Special Master about Corrective Action Plan for so-called non-case review systemic barriers	1.40 350.00/hr	490.00
6/25/2019 Attend HSD Automation Overview in Santa Fe	2.00 350.00/hr	700.00
8/29/2019 Review and revise draft CAP letter re.IT corrections and Interim solutions for denial of benefits due to excess verifications and Quik Guide	1.30 350.00/hr	455.00
For professional services rendered	8.70	\$3,045.00
NM GRT 8.4375		\$256.92
Total amount of this bill		\$3,301.92

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 ORIGINAL INVOICE WHICH IS NOT
 AVAILABLE. ACCOUNTING RECORDS HAVE
 BEEN CHECKED & AMOUNT IS DUE

[Signature]

I, D. Sandoval, hereby certify that the items listed on the attached invoice were received and accepted by this agency on or before June 30, 2019. I also certify that adequate cash and budget existed.

Signed *[Signature]* Date 7/6/19

3 JUL '19 12:19PM

NM Center on Law & Poverty

301 Edith Blvd., NE
Albuquerque, NM 87102**Invoice**

Date	Invoice #
7/5/2022	469

Bill ToState of New Mexico
Dept Fin & Admin, Local Gov't
Bataan Memorial Bldg
407 Galisteo
Santa Fe, NM 87501

P.O. No.	Terms	Project
April - Jun 2022	Net 30	

Quantity	Description	Rate	Amount
49.3	fees under Debra Hatten Gonzalez decree DHG Sovereign Hager 01/01/2022-03/31/2022	225.00	11,092.50
		Total	\$11,092.50

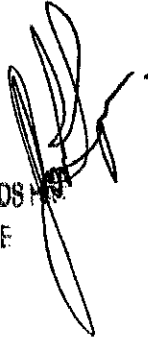
NM Center on Law & Poverty

924 Park Ave SW, #C
Albuquerque, NM 87102**Invoice**

Date	Invoice #
6/30/2020	358

Bill To
State of New Mexico Dept Fin & Admin, Local Gov't Bataan Memorial Bldg 407 Galisteo Santa Fe, NM 87501

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ORIGINAL INVOICE WHICH IS NOT
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P.O. No.	Terms	Project
apr-jun2020	Net 30	

Quantity	Description	Rate	Amount
13.4	unpaid fees under Debra Hatten Gonzalez decree DHG Teague Gonzalez 4/1/2020-6/30/2020	225.00	3,015.00
<p style="text-align: center;">RECEIVED AUG 04 2020 HSD SECRETARY'S OFFICE</p>		Total	\$3,015.00



center on
law and poverty

INVOICE # 358

924 Park Ave SW, Ste C
Albuquerque, NM 87102
505.255.2840
nmpovertylaw.org

Attorney: Teague Gonzalez
Billing Period: April 01, 2020 – June 30, 2020
Case: Debra Hatten Gonzales v. Earnest

4/3/20	Phone call with Special Master about March JSR.	0.1
4/3/20	Gathered evidence and index list, submitted to Special Master Parker.	2.0
4/6/20	Spoke with Special Master Parker regarding evidence submission, Doc 945.	0.2
4/7/20	Spoke with Special Master regarding Judge's Order setting page limits.	0.1
4/7/20	Finalize Motion to Reconsider, sent to co-counsel, sent to opposing counsel, and filed with Court.	1.0
4/9/20	Compiled Plaintiffs' Exhibits List and Exhibits, per Doc. 949, submitted to electronic case file.	1.4
4/9/20	Drafted April meet and confer agenda.	0.4
4/10/20	Wrote and emailed proposed agenda for April meet and confer; scheduled secure Zoom meeting for meet and confer.	0.3
4/13/20	Review Subject Matter Experts correspondence and answers from HSD	0.2
4/15/20	Prepared for April meet and confer, reviewed HSD response to subject matter expert questions.	1.5
4/15/20	Emailed parties re April meet and confer meeting details.	0.1
4/16/20	Reviewed SharePoint for 4/15/20 and 4/16/20 file uploads prior to 4/17/20 Meet and Confer.	1.0
4/16/20	Phone call with Mr. Parker re April Meet and Confer.	0.2
4/16/20	Emailed revised agenda for April Meet and Confer.	0.1
4/20/20	Draft April JSR	1.0
4/22/20	Edited Defendant's changes to March JSR.	0.6
4/27/20	Drafted email to Defendant re missing calculation tables on NOCAs.	0.2
5/7/20	Drafted agenda items for Mr. Parker for May meet and confer.	0.4
5/11/20	Drafted March JSR, create and send compare Word version to Counsel for Defendant.	0.3
5/14/20	Filed April JSR and JSR Data.	0.4
5/19/20	Responded to Counsel for Defendant's request for case name and number and supplied an additional NOCA.	0.1
6/16/20	Virtually attended CR Discovery Session - Amerasian	1.8

Total Hours: 13.4

Total Bill – 13.4 hrs X \$225/hr: \$3015.00

00193225

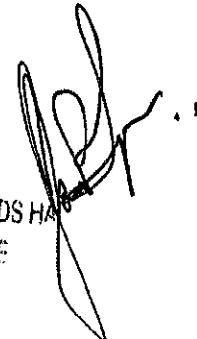
NM Center on Law & Poverty

924 Park Ave SW, #C
Albuquerque, NM 87102**Invoice**

Date	Invoice #
6/30/2020	357

Bill To
State of New Mexico Dept Fin & Admin, Local Gov't Bataan Memorial Bldg 407 Galisteo Santa Fe, NM 87501

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P.O. No.	Terms	Project
apr-jun2020	Net 30	

Quantity	Description	Rate	Amount
36.3	unpaid fees under Debra Hatten Gonzalez decree DHG Sovereign Hager 4/1/2020-6/30/2020	225.00	8,167.50
<p style="text-align: center;">RECEIVED AUG 04 2020 HSD SECRETARY'S OFFICE</p>			
		Total	\$8,167.50



center on
law and poverty

INVOICE # 357

924 Park Ave SW, Ste C
Albuquerque, NM 87102
505.255.2840
nmpovertylaw.org

Attorney: Sovereign Hager
Billing Period: April 01, 2020 – June 30, 2020
Case: Debra Hatten Gonzales v. Earnest

4/1/20	Edit declarations and prepare exhibits for Defendant's Motion to Modify and exhibit list for that motion.	2.3
4/3/20	Call with co-counsel.	0.6
4/6/20	Edit motion for clarification/reconsideration.	0.8
4/14/20	Call with Special Master.	0.6
4/17/20	Prepare for Meet and Confer.	0.8
4/17/20	Attend Meet and Confer.	1.4
4/17/20	Review Order on Defendant's Motion to Strike.	0.4
4/17/20	Call with co-counsel following Meet and Confer.	1.6
4/22/20	Edit JSRs for March and April.	0.5
4/24/20	Review order issued by court	0.4
5/6/20	Review Defendant's letter concerning a stay of the Decree and draft response.	0.8
5/6/20	Draft emails to opposing counsel about JSR.	0.4
5/6/20	Reviewed defendants quarterly report.	0.6
5/7/20	Review CAP compliance issues.	0.4
5/11/20	Emails with HSD and co-counsel about JSR draft.	0.4
5/12/20	Review Decree compliance issues with SNAP and Medicaid NOCAs.	0.6
5/13/20	Review HSD compliance documents loaded into SharePoint and prepare for Meet and Confer.	1.3
5/14/20	Call with the Special Master.	0.6
5/15/20	Prepped for Meet and Confer.	1.3
5/15/20	Attended Meet and Confer.	2.3
5/15/20	Met with co-counsel following Meet and Confer.	0.5
5/15/20	Drafted letter to HSD concerning failure to provide calculation tables.	0.4
5/15/20	Sent follow up list of action items to HSD after Meet and Confer.	0.3
5/18/20	Discuss calculation table issues with Teague.	0.6
5/20/20	Set up meeting with Special Master.	0.4
5/27/20	Meeting with co-counsel.	0.6
5/27/20	Prep for meeting with Special Master.	0.6
5/27/20	Meeting with Special Master and Plaintiffs' counsel.	1.0
6/2/20	Revise HSD JSR and compare to notes of meeting.	0.8
6/2/20	Drafted letter to HSD re outstanding items in Plaintiffs' Motion to Modify.	1.3
6/4/20	Drafted letter re: outstanding items in Plaintiffs' compliance Motion.	0.6

6/5/20	Revised letter to HSD on outstanding items.	0.6
6/8/20	Drafted letter to HSD about language access requirements.	0.7
6/15/20	Drafted and sent agenda items for Meet and Confer to HSD.	0.4
6/16/20	Drafted letter to the Special Master regarding HSD's case review process.	0.6
6/17/20	Meeting with HSD about outstanding compliance matters.	2.4
6/17/20	Prep for meeting with HSD and Special Master.	1.4
6/19/20	Meet with co-counsel.	0.4
6/19/20	Review HSD's Motion to Dismiss court orders.	0.6
6/19/20	Prep for Meet and Confer.	0.8
6/19/20	Attend Meet and Confer.	1.6
6/22/20	Drafted and sent email to Mr. Ritzma re information requests and documentation of past information requests.	0.4
6/24/20	Reviewed Meet and Confer outcomes and drafted JSR. Sent to Defendants.	1.2

Total Hours: 36.3

Total Bill – 36.3 hrs X \$225/hr: \$8,167.50



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INVOICE # 341 ✓

Attorney: Tim Davls
Billing Period: January 01, 2020 – March 31, 2020 ✓
Case: Debra Hatten Gonzales v. Earnest

1/15/20	Attended CR regarding FSP 300	0.8
2/28/20	Researched federal register for CAP required NMAC changes.	0.4
2/28/20	Research and draft section of Response to Motion to Strike	1.2
3/2/20	Drafted section of response to Mot. to Strike and edited pleading draft.	1.3

Total Hours: 3.70

Total Bill – 3.70 hrs X \$150/hr: \$555.00 ✓

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INVOICE # 340

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16-11-20

Attorney: Teague Gonzalez
Billing Period: January 01, 2020 – March 31, 2020
Case: Debra Hatten Gonzales v. Earnest

1/6/20	Review documents in SharePoint	0.3
1/6/20	Email to Special Master	0.3
1/8/20	Draft Reply to Defendant's Response	2.0
* 1/22/20	Drafted Reply to Compliance Motion	1.0
1/23/20	Emailed HSD OGC re reason code meeting	0.1
1/28/20	Participated by phone: Immigration CR, Aspen Discovery Session 2.	1.1
* 1/29/20	Drafted Notice of Completion of Briefing	0.1
* 1/31/20	Finalized Notice of Completion of Briefing and Request for Hearing in Two Pending Motions.	0.5
2/6/20	Drafted February Meet and Confer Agenda.	0.4
2/19/20	Drove to Santa Fe and back for Immigration ASPEN Discovery Session	2.1
2/19/20	Immigration ASPEN Discovery Session	2.8
2/21/20	Meet and Confer	1.5
2/26/20	Drafted JSR for February 2020 Meet and Confer	1.0
2/28/20	Finalized JSR	0.5
2/28/20	Drafted Response to Motion to Strike	1.5
3/2/20	Spoke with co-counsel re Motion, Case Review, Status Meeting	1.0
3/4/20	Finalized February JSR.	0.4
3/4/20	Finalized and filed Response to Motion to Strike.	0.7
3/5/20	Phone call with Special Master	0.1
3/9/20	Phone call with Special Master.	0.1
3/10/20	Drive time to Santa Fe for meeting with Special Master Parker and co-counsel.	2.1
3/10/20	Meeting with co-counsel about case	0.5
3/10/20	Met with Special Master Parker and co-counsel	1.0
3/11/20	Met with Subject Matter Experts and HSD Office of General Counsel.	1.0
* 3/12/20	Spoke with co-counsel regarding motion hearing, subject matter expert meeting, and responding to letter from opposing counsel.	0.8
3/12/20	Drive time to and from Santa Fe for Court Ordered telephonic hearing.	2.1
3/12/20	Attended telephonic hearing in Santa Fe.	0.8
3/12/20	Drafted letter to Special Master	1.0
3/12/20	Drafted letter to Counsel for Defendant re Judge's order on compliance issues.	0.3
3/13/20	Spoke with co-counsel and then transmitted letters re subject matter expert so and reply to OGC letter re compliance.	1.0
3/17/20	Phone call with co-counsel regarding April 1 hearing.	1.7
3/17/20	Call with Special Master parker	0.1
3/18/20	Emailed Defendant regarding VCL and SharePoint file issue.	0.1
* 3/19/20	Reviewed Defendant's Motion for Order re violation of sealed hearing.	0.1
3/19/20	Prepped for March meet and confer, reviewed SharePoint documents uploaded since last	1.0
3/20/20	Telephonic Meet and Confer	1.0

X 3/23/20	Call with co-counsel re Compliance motion hearing.	0.5
X 3/23/20	Spoke with co-counsel re April 1 hearing	0.2
3/24/20	Call with co-counsel	0.1
X 3/25/20	Spoke with co-counsel re Judge's Order for Telephonic Conference on 3/26/20.	0.5
X 3/25/20	Emailed potential witness regarding April 1, 2020 hearing.	0.1
X 3/26/20	Telephonic conference with Judge Gonzales regarding April 1 hearing.	1.0
3/26/20	Spoke with Special Master over telephone.	0.1
X 3/30/20	Draft affidavit for Isabel Ribe, SF Dreamers Project, read two new SIJ case files, emailed Sovereign Hager.	1.5
3/30/20	Edited Defendant draft March JSR.	1.0
3/31/20	JSR edits	1.0
X 3/31/20	Prepared exhibits for hearing on 2 motions	0.5
X 3/31/20	Drafted declaration, reviewed documents and compiled exhibits for hearing on two motions.	2.1

Total Hours: 40.7

Total Bill - 40.7 hrs X \$225/hr: \$9,157.50

Total Bill - 40.7 hrs - 8.9 hrs* X \$225/hr: \$7,155.00 s/s ✓



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INVOICE # 339 ✓

Attorney: Sovereign Hager
Billing Period: January 01, 2020 – March 31, 2020 ✓
Case: Debra Hatten Gonzales v. Earnest

1/3/20	Drafted JSR	0.6
1/9/20	Reviewed HSD data on share point and emailed the Special Master	0.6
1/10/20	Call with co-counsel about case	0.6
* 1/10/20	Edited draft Reply to Motion to Enforce	1.3
1/14/20	Attended Immigrant CR meeting	1.2
1/16/20	Prep for Meet and Confer, review data and information HSD put in SharePoint	1.8
1/17/20	Call with co-counsel about case	0.5
* 1/17/20	Edit Motion Reply	1.8
1/17/20	Meet and Confer with HSD	1.3
1/18/20	Review reason codes and draft letter to HSD concerning illegal denial and closure reasons	1.9
* 1/22/20	Edited Reply Brief for Motion to Enforce	1.4
* 1/23/20	Edits to Reply Brief and file	1.2
1/24/20	Travel to and from Santa Fe for meeting with HSD about reason codes	2.0
1/24/20	Attend meeting with HSD about reason codes	1.2
1/27/20	Call with Special Master	0.3
1/30/20	Meeting with the Special Master and Compliance Specialist	1.3
2/6/20	Reviewed plan for Meet and Confer	0.3
2/27/20	Edit JSR	0.6
2/27/20	Email response to specific questions from co-counsel	0.8
3/2/20	Edits to response to Motion to Strike	0.6
3/2/20	Call with co-counsel about Motion to Strike	0.6
3/5/20	Collect questions for subject matter expert meeting	0.6
* 3/8/20	Drafted and edited letter to HSD about settlement of motion	1.3
* 3/9/20	Edited letter about settlement of our motion	0.4
3/11/20	Call with Teague about subject matter expert meeting	0.4
3/11/20	Edit letter to Special Master	0.3
3/12/20	Edits to letter concerning HSD's compliance with Court Order.	0.5
* 3/20/20	Review hearing prep and exhibit list.	0.4

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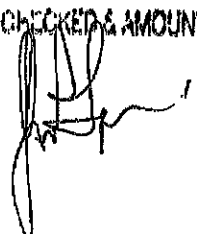
924 Park Ave SW, #C
Albuquerque, NM 87102**Invoice**

Date	Invoice #
10/8/2019	303

Bill To
State of New Mexico Dept Fin & Admin, Local Gov't Bataan Memorial Bldg 407 Gallisteo Santa Fe, NM 87501

10-24-19.

P.O. No.	Terms	Project
jul-sept2019	Due on receipt	

Quantity	Description	Rate	Amount
9.5	unpaid fees under Debra Hatten Gonzalez decree DHG Maria Griego 7/1/19-9/30/19	100.00	950.00
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Total			\$950.00

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Receipt ID 0000159266

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Date	Invoice #
10/8/2019	302

10-23-19

Bill To
State of New Mexico Dept Fin & Admin, Local Gov't Bataan Memorial Bldg 407 Galisteo Santa Fe, NM 87501

P.O. No.	Terms	Project
jul-sept2019	Due on receipt	

Quantity	Description	Rate	Amount
31.4	unpaid fees under Debra Hatten Gonzalez decree DHG Tim Davis 7/1/19-9/30/19	150.00	4,710.00
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INVOICE # 302

Attorney: Tim Davis
Billing Period: July 1, 2019 – September 30, 2019
Case: Debra Hatten Gonzales v. Earnest

7/18/19	Drafted comments on ABAWD 001 and FSP 003.	2.0
7/30/19	Attended CR 2958 in SF.	2.5
7/30/19	Travel to and from CR 2958.	2.0
8/8/19	Attended CR 2946.	2.5
8/8/19	Travel to and from CR 2946.	2.0
8/14/19	Attended CR 2840.	2.5
8/14/19	Travel to and from CR 2840.	2.0
9/6/19	Travel to and from CR 2831.	2.0
9/6/19	Attended CR 2831 ABAWDs Interim Review.	1.6
9/9/19	ASPEN Interim Review - Pine Team.	3.5
9/24/19	Travel to and from CR 2831.	2.0
9/24/19	Attended CR 2840.	2.9
9/25/19	Attended CR 2840.	2.3
9/25/19	Travel to and from CR 2840.	1.6

Total Hours: 31.4

Total Bill – 31.4 hrs X \$150/hr: \$4,710.00

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Receipt ID 0000159272

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924 Park Ave SW, #C
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Date	Invoice #
10/8/2019	304

Bill To
State of New Mexico Dept Fin & Admin, Local Gov't Bataan Memorial Bldg 407 Galisteo Santa Fe, NM 87501

10/23/19

P.O. No.	Terms	Project
jul-sept2019	Due on receipt	

Quantity	Description	Rate	Amount
50.4	unpaid fees under Debra Hatten Gonzalez decree DHG Teague Gonzalez 7/1/19-9/30/19	225.00	11,340.00
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Total			\$11,340.00



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INVOICE # 304

Attorney: Teague González
Billing Period: July 1, 2019 – September 30, 2019
Case: Debra Hatten Gonzales v. Scrase

7/17/19	Driving to Santa Fe and back again for DHG Discovery Session, CR 2840.	2.0
7/17/19	Attend Discovery for CR 2840.	1.1
7/18/19	Discuss matrix letter with Sovereign.	1.4
7/22/19	Legal research and editing to HSD's verification matrix.	2.3
7/23/19	Finalized draft verification matrix with comments for HSD.	2.5
7/24/19	Drafted letter on verification matrix comment and edits needed.	0.8
7/25/19	Met with Sovereign and discussed verification matrix changes.	1.5
7/25/19	Drafted final edits to verification matrix	0.5
7/26/19	Driving to Santa Fe and Back again for DHG Discovery Sessions, CR 2840 CR 2946.	2.0
7/26/19	DHG Interim Review - CR 2840 Changes to the Notice of Case Action.	2.0
7/26/19	DHG Interim Review - CR 2946 Program Independence.	2.7
8/13/19	Driving to and from Santa Fe for CR 2958.	2.0
8/13/19	Attend CR 2958.	2.5
8/20/19	Drafted August JSR.	1.0
8/27/19	Drove to and from Santa Fe for CR 2958	2.0
8/27/19	Attend Discovery Session CR 2958.	1.5
8/28/19	Driving to and from SF for CR 2931 MA Admin Renewal Process Discovery Session	2.0
8/28/19	Attended CR 2931.	1.3
8/30/19	Drafted response email to Defendant's July JSR CAP attachment changes.	0.3
8/30/19	Drafted response letter to HSD General Counsel re request for additional time to comply with Decree.	0.8
9/4/19	Phone call with Special Master Parker.	0.3
9/4/19	Drafted edits to July JSR.	2.0
9/6/19	Drove to and from Santa Fe for CR 2946 meeting.	2.0
9/6/19	Attended CR 2946 Interim Review Meeting in Santa Fe.	3.0
9/10/19	Attended CR 2958 Discovery Session.	2.9
9/10/19	Driving to and from Santa Fe for CR 2958.	2.0
9/11/19	Attended Verification Matrix in the QwikGuide demo at HSD ABQ.	2.0
9/19/19	Attended CR 2946.	1.6
9/19/19	Drive to and from SF for CR 2956.	2.2
9/24/19	Email July JSR (Plaintiff's edit) to Defendant.	0.1
9/26/19	Email request to HSD for screen grabs of verification matrix in Qwikguide.	0.1

Total Hours: 50.4

Total Bill – 50.4 hrs X \$225/hr: \$11,340.00

Receipt ID 0000159263

00184761

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Invoice924 Park Ave SW, #C
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Date	Invoice #
10/8/2019	301

Bill To
State of New Mexico Dept Fin & Admin, Local Gov't Bataan Memorial Bldg 407 Galisteo Santa Fe, NM 87501

10/23/19.

P.O. No.	Terms	Project
jul-sept2019	Due on receipt	

Quantity	Description	Rate	Amount
82.9	unpaid fees under Debra Hatten Gonzalez decree DHG Sovereign Hager 7/1/19-9/30/19	225.00	18,652.50
		Total	\$18,652.50



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INVOICE # 301

Attorney: Sovereign Hager
Billing Period: July 1, 2019 – September 30, 2019
Case: Debra Hatten Gonzales v. Scrase

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7/1/19	Call with Special Master.	0.3
7/1/19	Finalized and sent letter to HSD about remaining disagreements on the CAP.	0.5
7/2/19	Meeting with HSD on joint CAP.	2.0
7/2/19	Call with Special Master.	0.4
7/3/19	Call with Karmela about CAP.	0.4
7/3/19	Review draft of proposed joint order and send edits.	0.3
7/5/19	Reviewed denial reason master list sent by HSD and drafted letter about CAP items related to EMSA based on that information.	0.6
7/8/19	Call with the Special Master.	0.5
7/9/19	Re-worked CAP and reviewed documents referenced by HSD after phone call.	0.8
7/9/19	Call with HSD about CAP.	0.4
7/9/19	Review documents and draft finalized CAP and letter to HSD.	2.3
7/10/19	Call with compliance specialist.	0.4
7/10/19	Finalized and filed CAP.	0.4
7/10/19	Call with Karmela to finalize CAP.	0.3
7/10/19	Reviewed CAP sent by Karmela.	0.6
7/18/19	Immigration work group meeting.	2.0
7/18/19	Edited JSR.	0.8
7/19/19	Travel to and from Santa Fe for Meet and Confer.	2.0
7/19/19	Edited letter re ABAWD requirements.	0.5
7/19/19	Attended Meet and Confer.	1.8
7/25/19	Review and edit verification matrix with changes.	1.3
7/30/19	Located previous correspondence on sponsor deeming and emailed it to Laurie and Wanda.	0.5
7/31/19	Meeting with Special Master regarding moot court orders and HSD compliance with Decree.	1.8
7/31/19	Prepared for meeting with Special Master re moot court orders. Documented HSD acknowledgment that requirements in outstanding court orders are required by current decree.	2.0
8/6/19	Researched and wrote response to questions from Justice Chaves re: verification matrix.	1.8
8/8/19	Travel to and from Santa Fe for CR meeting on delinking Medicaid from SNAP.	2.0
8/8/19	Attended delinking Medicaid from SNAP CR meeting.	2.0
8/9/19	Call with compliance specialist.	1.0
8/9/19	Edited CAP with current status of items and edited draft JSR for July.	1.4
8/9/19	Finalized and file June JSR.	0.4
8/11/19	Travel to Deming for ISD office visit.	3.5
8/12/19	ISD office visit and meeting.	2.0
8/12/19	Travel back to Albuquerque from Deming	4.0

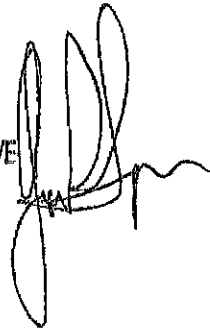
8/14/19	Responded to email from Justice Chavez about verification matrix and double-checked legal citations.	0.4
8/15/19	Call with Compliance Specialist.	1.5
8/15/19	Emails with Laurie Kraw re: Immigrant eligibility meeting.	0.3
8/16/19	Draft letter to Special Master.	0.8
8/16/19	Call with Justice Chavez.	0.4
8/16/19	Prep for Meet and Confer.	0.8
8/16/19	Attend Meet and Confer.	2.0
8/16/19	Call with Dan Yohalem.	0.4
8/19/19	Respond to email from Paul Ritzma explaining HSD's history with Reason Codes.	0.4
8/19/19	Travel to and from Santa Fe for meeting on the status of court order compliance with HSD and the Special Master.	2.0
8/19/19	Meeting with the Special Master and Compliance Specialist on the status of HSD compliance with multiple court orders.	1.5
8/19/19	Responded to email from Paul Ritzma about reason codes.	0.4
8/20/19	Finalize edits to the compliance chart.	0.4
8/20/19	Edited JSR draft.	0.6
8/26/19	Call with Special Master.	0.3
8/26/19	Call with co-counsel about status of compliance.	0.4
8/26/19	Reviewed prior Orders and drafted response to HSD letter denying access to previously agreed document submissions.	2.4
8/27/19	Meeting with Special Master.	1.5
8/27/19	Drafted email and letter to the Special Master.	0.6
8/28/19	Meet with Teague to go over Medicaid admin renewal CR and compliance issues for CR meeting.	0.5
8/29/19	Call with Special Master.	0.4
8/30/19	Call with Special Master.	0.4
8/30/19	Call with Teague about HSD compliance.	0.3
8/30/19	Edit letter to HSD about documents.	0.3
9/4/19	Re-worked CAP format and edited JSR following HSD's changes.	1.8
9/4/19	Call with Special Master.	0.4
9/5/19	Read email from Constance and drafted response related to July JRS.	0.3
9/5/19	Discussed simplified CAP for JSR purposes with Teague.	0.3
9/9/19	Travel to and from Santa Fe for meeting with OGC.	2.0
9/9/19	Meeting with HSD OGC about the case and working together.	1.0
9/9/19	Immigrant workgroup meeting.	1.5
9/18/19	Reformat CAP with specific status for each item.	1.3
9/19/19	Meeting with Special Master.	1.3
9/19/19	Read HSD's draft "memo" and emails regarding Meet and Confer.	0.4
9/19/19	Drafted summary of issues for meeting with Special Master.	0.8
9/20/19	Reviewed state management evaluations and FNS reports.	0.6
9/20/19	Reviewed Immigrant eligibility webinar and training documents.	1.4
9/20/19	Travel to and from Santa Fe for Meet and Confer.	2.0
9/20/19	Attend Meet and Confer.	0.8
9/20/19	Call with Special Master.	0.4
9/20/19	Research federal law and draft comments on immigrant eligibility webinar and email to HSD.	1.8
9/23/19	Edited JSRs for September and responded to OGC email about August JSR.	0.4
9/23/19	Review RTE training.	0.8
9/24/19	Call with Justice Chavez about August JSR.	0.4

9/24/19	Edits to August JSR and email to Justice Chavez.	0.4
9/24/19	Call with co-counsel about case.	0.5
9/25/19	Drafted letter with comments on real time eligibility process training.	0.6
9/25/19	Call with compliance specialist.	0.4
9/25/19	Met with Tim to go over problems with NOCA for CR meeting that day.	0.4
9/26/19	Emailed JSR to Special Master to verify accuracy of the characterization of his statements.	0.3
9/26/19	Read letter from HSD re: immigrant eligibility.	0.4
9/27/19	Filed August JSR.	0.2

Total Hours: 82.9

Total Bill – 82.9 hrs X \$225/hr: \$18,652.50

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INVOICE # 323

Attorney: Sovereign Hager
Billing Period: October 01, 2019 – December 31, 2019 /
Case: Debra Hatten Gonzales v. Earnest

10/1/19	Meeting with HSD and Special Master about Immigrant related issues.	2
10/1/19	Preparation for Immigration meeting with HSD.	0.4
10/3/19	Went over email with Tim re CR meetings and problems with calculation tables.	0.3
10/4/19	Edit JSR for September.	0.6
10/16/19	Meeting with the Special Master and Compliance Specialist.	1
10/16/19	Reviewed documents to prepare for meeting with the Special Master.	0.6
10/18/19	Prepare for Meet and Confer, review HSD's document "cap reporting tool".	0.8
10/18/19	Meet with Special Master and Compliance Specialist in advance of meeting.	0.3
10/18/19	Meet and Confer	1
10/21/19	Attempted to call in to CR on Medicaid admin renewal.	0.4
10/23/19	Draft JSR for October.	1.3
10/24/19	Call with Mr. Parker and Ms. McKissic.	0.5
10/25/19	Edit VCL letter.	0.8
X 10/26/19	Edit Motion to Enforce Compliance.	2.6
X 11/2/19	Edit notice arguments into Motion to Enforce Compliance.	1.8
X 11/7/19	Edits and review documents supporting Motion to Enforce Compliance.	2
11/8/19	Call with the Special Master.	0.4
X 11/11/19	Edits to Motion to Enforce Compliance.	2.4
11/12/19	Propose agenda items for Meet and Confer.	0.3
11/12/19	Call with Compliance Specialist and Special Master.	0.8
11/12/19	Review HSD JSR edits.	0.4
11/14/19	Call with Special Master.	0.6
11/14/19	HSD Immigration work group and discussion about SNAP disability verification form.	0.8
11/14/19	Travel to and from Immigration work group meeting.	2
X 11/14/19	Edits to motion, to enforce gather exhibits.	1.6
11/15/19	Meet and Confer in Santa Fe.	1.2
11/15/19	Drive to and from Meet and Confer with HSD in Santa Fe.	2
11/15/19	Preparation for Meet and Confer.	0.4

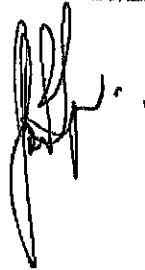
11/15/19	Email to HSD Counsel about inaccuracies in JSR	0.3
11/15/19	Review "revised JSR" sent by HSD counsel.	0.3
11/18/19	Edit Motion to Enforce	1.3
11/18/19	Finalized and filed JSR.	0.4
*11/19/19	Edited Motion to Enforce and attached all Exhibits for filing.	2.3
11/20/19	Prepared court presentation for status conference.	3.3
11/20/19	Read HSD's motion to modify settlement.	0.6
11/21/19	Travel to and from Las Cruces for status conference.	8
11/21/19	Status conference.	2.3
11/22/19	Meeting with co-counsel Dan Yohalem.	0.8
11/25/19	Call with Dan Yohalem about case.	0.4
11/25/19	Discussed briefing schedule with Teague	0.4
11/25/19	Reviewed JSR draft for November.	0.3
11/27/19	Legal research for response to HSD motion.	1.6
12/2/19	Call with Dan Yohalem about case.	0.4
12/2/19	Reviewed draft response on FSP 003.	0.6
*12/2/19	Draft response to OGC re request to withdraw motion.	0.4
12/3/19	Research for response to HSD motion to modify.	1.8
12/3/19	Call with Special Master.	0.4
12/5/19	Drafted motion response	4.4
12/5/19	Research and drafting motion response.	1.4
12/9/19	Travel to and from Santa Fe for interviews with Special Master and Compliance Specialist	2
12/9/19	Interview with Mr. Parker	1
12/9/19	Interview with Ms. McKissic	0.5
12/9/19	Meeting with Dan Yohalem about case	1.4
12/9/19	Call with Special Master	0.3
12/10/19	Call with Dan Yohalem about the case.	0.6
*12/11/19	Incorporated new research into brief response.	3.3
12/11/19	Call with Special Master	0.4
12/12/19	Sealed telephonic hearing	0.8
12/12/19	Call with Dan Yohalem.	0.4
12/17/19	Edit motion response	1.8
*12/18/19	Final edits to motion, prepared exhibits and filed.	2.1
12/18/19	Travel to and from meeting with HSD about immigrant related IT changes	2
12/18/19	Meeting on immigrant related IT changes in Santa Fe	3

12/19/19	Review docs in Sharepoint and prepare for Meet and Confer.	1.2
12/20/19	Prepare for Meet and Confer	1.3
12/20/19	Attend Meet and Confer with HSD.	1.4

Total Hours: 84.5
Total Bill - 84.5 hrs X \$225/hr: \$19,012.50

Total Bill - 84.5 hrs - 18.5 hrs* X \$225/hr: \$14,850.00 sls ✓

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INVOICE # 322

924 Park Ave SW, Ste C
Albuquerque, NM 87102
505.255.2840
nmpovarylawn.org

Attorney: Teague Gonzalez
Billing Period: October 01, 2019 - December 31, 2019
Case: Debra Hatten Gonzales v. Earnest

10/9/19	Drove to and from Santa for CR 2958.	2
10/9/19	CR 2958 - broke out in small groups to do line by line analysis of VCL.	3.1
* 10/10/19	Research for Motion to Enforce Compliance	1
* 10/11/19	Reviewed prior motions, Court Orders and Documents in preparation of motion filing.	1.5
10/11/19	Email to compliance specialist Ramona McKissic	0.1
* 10/14/19	Draft Motion to Enforce Compliance.	4.4
10/18/19	Drove to Santa Fe for CR 2958 Meeting	2
10/18/19	Attended CR 2958 Meeting in Santa Fe	1.5
10/25/19	Verification Checklist and Proofs List Letter to Mr. Ritzma, CR 2958	8
11/1/19	Attended CR 2931 Meeting in Santa Fe	0.8
11/1/19	Drove to Santa Fe for CR 2931 Meeting	2.2
11/13/19	Provided information to Special Master regarding CAP compliance	6
11/26/19	Drove to Santa Fe for CR 2946 Meeting with HSD	2.2
11/26/19	Attended CR 2946 Meeting, Cedar Team Interim Review in Santa Fe	1
11/26/19	Edit November JSR Draft	1
12/2/19	Drive to and from Santa Fe for CR 2958 Meeting with HSD	2.1
12/2/19	Attended CR 2958 Meetings, Maple, Juniper, and Pine Team Review in Santa Fe	4.9
12/6/19	Researched law, edited draft form and drafted letter on FSP 300 Food Stamp Verification of disability.	2
* 12/11/19	Draft Response Motion Work	4
12/12/19	Attempted to attend scheduled CR 2958 meeting and learned it was cancelled without notice - emailed HSD and cc'd SM, CS, OGC.	1.5
12/12/19	Attended CR 2958 via telephone	2.9
12/16/19	Review Sharepoint docs on Katrina's computer, unable to access Excel docs without password. Emailed Jacob Daniels with password request.	0.4
* 12/23/19	Phone call with Constance re extension of time to reply to Doc 908	0.1
* 12/23/19	Draft motion extension of time and draft order, email to Defendant	0.5
* 12/30/19	Finalize and file Motion to Extend time to Reply	0.5

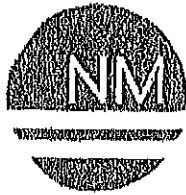
Total Bill - 55.7 hrs - 12 hrs * X \$225/hr: \$9,832.50 sls

Total Hours: 55.7

Total Bill - 55.7 hrs X \$225/hr: \$12,532.50

Advocating for equal rights, opportunities, and justice

10/30/2022 5:20 PM



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924 Park Ave SW, Ste C
Albuquerque, NM 87102
505.255.2840
nnpovertylaw.org

INVOICE # 321 ✓

Attorney: Tim Davis
Billing Period: October 01, 2019 -- December 31, 2019 ✓
Case: Debra Hatten Gonzales v. Earnest

10/2/19	Draft email to HSD outlining NOCA issues with calculation tables and the standard utility allowance	0.4
10/2/19	Read case law cited in MC and JSR motion HSD provided to us in email, Analyze motion.	1.2
10/3/19	Revise and send email to Department regarding calculation table issues	0.4
10/8/19	Research case law on consent decrees.	0.9
* 10/11/19	Completed research and drafted section of Motion to Enforce Compliance	2.8
10/15/19	Proof-read Motion to Enforce Compliance Section	1.5
10/23/19	Attended CR 7534 meeting in SF	2.4
10/23/19	Drove to and from Santa Fe to attend CR 7534 Meetings	2
11/5/19	Drafted and filed Motion to Substitute Counsel	0.4
12/10/19	Research for and drafting section for Response to HSD's Motion to Modify	2
12/11/19	Response to motion to modify, edits and research	0.7
12/13/19	CR 2946 meeting in SF	1.2
12/13/19	Travel to and from Santa Fe for Meeting on CR 2946	2

Total Hours: 17.9

Total Bill -- 17.9 hrs X \$150/hr: \$2,685.00

17.9 hrs - 2.8 hrs* = 15.1 hrs X \$150/hr: \$2,265.00 sls ✓

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Receipt ID 0000156168

NM Center on Law & Poverty

924 Park Ave SW, #C
Albuquerque, NM 87102

Invoice

Date	Invoice #
7/2/2019 ✓	280-B ✓

Bill To
State of New Mexico Dept Fin & Admin, Local Gov't Bataan Memorial Bldg 407 Galisteo Santa Fe, NM 87501

87-9-19

P.O. No.	Terms	Project
6/7-6/30	Due on receipt	

Quantity	Description	Rate	Amount
10	unpaid fees under Debra Hatten Gonzalez decree DHG Maria Griego 6/7/19-6/30/19	100.00	1,000.00
<p>THIS IS A TRUE COPY OF A VALID ORIGINAL INVOICE WHICH IS NOT AVAILABLE. ACCOUNTING RECORDS HAVE BEEN CHECKED & AMOUNT IS DUE</p> <p><i>[Signature]</i></p> <p>I, C. Graham, certify for Danny Sandoval on 7/5, that the items listed on the attached invoice were received and accepted by this agency on or before June 30, 2019. I also certify that adequate cash and budget existed.</p> <p>Signed <i>[Signature]</i> Date 7/5/19</p>			
Total			\$1,000.00

JUL '19 11:18AM



924 Park Ave SW, Ste C
Albuquerque, NM 87102
505.255.2840
nmpovertylaw.org

INVOICE # 280-B

Attorney: Maria Griego
Billing Period: June 7, 2019- June 30, 2019
Case: Debra Hatten Gonzales v. Earnest

6/7/19	Review MAGI training and write letter.	3.0
6/25/19	Review and comment on IR notice and FSP notice.	2.0
6/28/19	Travel to and from Santa Fe and attend CR	4.0
6/28/19	Prepare for CR – review relevant law and CR document	1.0

Total Hours: 10.0

Total Bill – 10.0 hrs X \$100/hr: \$1,000.00

Receipt ID 0000156164

00181259

NM Center on Law & Poverty

924 Park Ave SW, #C
Albuquerque, NM 87102

Invoice

Date	Invoice #
6/30/2019	279-B

8-9-19

Bill To
State of New Mexico Dept Fin & Admin, Local Gov't Bataan Memorial Bldg 407 Galisteo Santa Fe, NM 87501

P.O. No.	Terms	Project
6/7-6/30	Due on receipt	

Quantity	Description	Rate	Amount
34.1	unpaid fees under Debra Hatten Gonzalez decree DHG Sovereign Hager 6/7/19-6/30/19	225.00	7,672.50
<p>I, C. Graham, certify for Danny Sandoval on 7/5, that the items listed on the attached invoice were received and accepted by this agency on or before June 30, 2019. I also certify that adequate cash and budget existed.</p> <p>Signed <u>C. Graham</u> Date <u>7/5/19</u></p>		<p>THIS IS A TRUE COPY OF A VALID ORIGINAL INVOICE WHICH IS NOT AVAILABLE. ACCOUNTING RECORDS HAVE BEEN CHECKED & AMOUNT IS DUE</p> <p><u>C. Graham</u></p>	
		Total	\$7,672.50

JUL 19 11:17AM



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INVOICE # 279-B

924 Park Ave SW, Ste C
Albuquerque, NM 87102
505.255.2840
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Attorney: Sovereign Hager
Billing Period: June 07, 2019 - June 30, 2019
Case: Debra Hatten Gonzales v. Earnest

6/7/19	Call with Maria about MAGI training docs. Reviewed letter she drafted.	0.5
6/7/19	Billing for DHG .	2.0
6/17/19	Travel to and from Santa Fe for meeting with HSD about operations manual and AVA tool.	2.0
6/17/19	HSD demo of field operations guide and AVA.	1.3
6/17/19	Meet with special master and HSD counsel about plan to finalize CAP	0.4
6/17/19	Call with Daniel Yohalem about case.	0.3
6/18/19	Developed content for immigrant eligibility training and prepared.	2.3
6/18/19	Accessed the Field Operations Manual and reviewed contents in order to respond to email from Constance Tatham.	0.5
6/18/19	Call with the Special Master.	0.3
6/18/19	Reviewed past requests for information to HSD and drafted email response.	0.4
6/19/19	Prepared for immigrant eligibility training.	3.2
6/19/19	Scheduled with staff about covering CR meetings with HSD.	0.4
6/20/19	Call with HSD about CAP.	0.4
6/20/19	Call with John Emery	0.3
6/20/19	Call with special master.	0.4
6/20/19	Call with Dan Yohalem about case.	0.4
6/20/19	Prep for immigrant eligibility training.	0.6
6/20/19	Immigrant eligibility training.	2.3
6/20/19	Meeting with HSD attorney and immigrant eligibility expert about work together on case.	0.5
6/21/19	Review HSD changes to CAP and prepare for the meet and confer.	0.8
6/21/19	Meet and confer re: CAP	1.8
6/21/19	Follow up discussion with co counsel about case.	0.5
6/24/19	Review prior correspondence and gather documents related to immigrant eligibility to update HSD at meeting on outstanding issues.	0.8
6/24/19	Travel to and from Santa Fe for meeting about HSD corrective actions.	2.0
6/24/19	Meeting with HSD about corrective action to address systemic barriers not identified in case review.	1.3
6/25/19	Drive to and from Santa Fe to meet with HSD about automated system improvements.	2.0
6/25/19	Meeting with HSD about IT automation.	1.0
6/26/19	Call with Karmela about joint CAP	0.5
6/27/19	Call with Compliance Specialist.	0.3
6/28/19	Call with Compliance Specialist	2.2
6/28/19	Drafted letter to HSD identifying areas of the CAP that we disagree with.	1.6
6/28/19	Reviewed HSD CRs and proposed joint CAP.	0.8

Total Hours: 34.1

Total Bill – 34.1 hrs X \$225/hr: \$7672.50